



GARY R. HERBERT
Governor

GREGORY S. BELL
Lieutenant Governor

State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

September 18, 2013

Ken May, General Manager
Canyon Fuel Company, LLC
597 South SR24
Salina, Utah 84654

Subject: Expansion of Lift #5, Canyon Fuel Company, LLC, Sufco Mine, C/041/0002,
Task ID #4394

Dear Mr. May:

The Division has reviewed your application to Expand Lift #5 at the Waste Rock Disposal Site at the Sufco Mine. The Division has identified deficiencies that must be addressed before final approval can be granted. The deficiencies are listed as an attachment to this letter.

The deficiencies authors are identified so that your staff can communicate directly with that individual should questions arise. The plans as submitted are denied. Please resubmit the entire application by no later than November 19, 2013.

Please note that only one copy in redline/strikeout format is required for review.

If you have any questions, please call me at (801) 538-5325.

Sincerely,

Daron R. Haddock
Coal Program Manager

DRH/sqs
O:\041002.SUF\WG4394\Deficiencies.docm



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FINDINGS DOCUMENT

Utah Coal Regulatory Program

PID: C0410002
TaskID: 4394
Mine Name: SUFCO MINE
Title: EXPANSION OF LIFT #5

Environmental Resource Information

Soils

Deficiencies Details:

pburton

Operation Plan

Topsoil

Deficiencies Details:

R645-301-122, In Section 2.12, please reference where the B-1 boring log can be found in the MRP.

R645-301-121.200, Draw a line around the Lift #4 topsoil storage area on Map 4.

pburton

Spoil Waste Refuse

Deficiencies Details:

R645-301-121.100, 1) The C2 form indicates pages 2-1 through 2-10 in Vol. 3 are to be replaced. Replacement page 2-3 (Sections 2.4 and 2.4.1) was not found with this submittal. Please include Section 2.4 and 2.4.1 with the amendment. 2) Narrative in Vol 3, section 3.4 and 4.2 has been removed without the use of strikeout; Do not delete, but update the narrative with the acreage dedicated to waste rock storage currently, the approximate final acreage of the waste rock fill in all lifts, and the final design capacity of the waste rock site.

R645-301-121.200, The permitted area has increased since 2/1/2011 from 10.98 acres to 11.6 acres (Task 4395) to 12.22 acres with this amendment (Vol 1, p. 1-12). Please explain, since the waste rock permit boundary appears to be the same.

R645-301-121.300, Amendments to the MRP must be provided in redline/strikeout format; new language is shown in redline and deleted language is shown in strikeout. Narrative in Vol 3, sections 3.3 and 4.2 has been removed without the



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use of strikeout. This narrative concerning the original construction design is still pertinent and must be retained.

R645-301-512.200, Please modify the capacity estimates in Section 3.3 of Volume 3 (page WRDS 3-13) to match the estimates provided by the DOGM engineer. Section 3.1.3 also needs to be modified to include the following commitment language: ""The slope stability and safety factor will be maintained throughout the expansion of lift #5 and any reconfiguration depicted on updated versions of Map 2."" Also, please resubmit Map #2 to include the previously included cross section lines as well as add an additional cross section for the expansion portion of lift #5.

R645-301-521.165, The revision to Map 2 must include cross section locations (as currently shown on the approved map). A cross section should be added in the Lift #5 expansion area showing ditch #2 in relation to the waste rock slope.

pburton

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jowen

Hydro Acid_Toxic

Deficiencies Details:

R645-301-731.100 and -553.252, 1) The Permittee has modified the sampling plan from one quarterly sample to one sample per 10,000 tons (Section 3.1.5). This suggested sampling rate will not provide an adequate representation of the waste; does not correspond with sampling required at similar waste rock sites and can not be approved. 2) A density of 1.2 tons/ yd³ is implied by the statement, ""The original fill volume was estimated at 10,000 tons or 8,200 cubic yards per year."" (Vol 3, p. 3-12). In the cover letter received 8/14/2013, the Permittee states a reluctance to rely this density for conversion from tonnage to volume. If this figure is no longer useful, please provide a current approximation for density of the SUFCO waste rock in the MRP, such that conversion between tonnage and volume can be made.